

BRUCE C. YOUNG, ESQ., Bar #5560
ETHAN D. THOMAS, ESQ., Bar #12874
LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway, Suite 300
Las Vegas, NV 89169-5937
Telephone: 702.862.8800
Fax No.: 702.862.8811

Attorneys for Defendants
CLARK COUNTY SCHOOL DISTRICT,
EDWARD GOLDMAN and ANITA WILBUR

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ELENA RODRIGUEZ-MALFAVON,

Plaintiff,

vs.

CLARK COUNTY SCHOOL DISTRICT,
EDWARD GOLDMAN and ANITA
WILBUR,

Defendants.

CASE NO. 2:12-CV-01673-APG-PAL

**[PROPOSED] STIPULATION AND
ORDER TO EXTEND TIME FOR THE
PARTIES TO FILE A JOINT PRETRIAL
ORDER**

[THIRD REQUEST]

Plaintiff, ELENA RODRIGUEZ-MALFAVON and Defendant, CLARK COUNTY SCHOOL DISTRICT¹, by and through their respective counsel of record, do hereby stipulate and agree to extend the current deadline to file a Joint Pretrial Order of February 19, 2016, by an additional week, up to and including **February 26, 2016**.

The parties agree that the instant extension is necessary because although both parties have exchanged drafts of the pretrial order, the caseload and other responsibilities of counsel for both parties has not allowed them sufficient time to come to an agreement on various issues in order to complete the Pretrial Order. The instant extension is also necessary because counsel for Plaintiff has

¹ While not specifically addressed in the Court's Order, Defendants Edward Goldman and Anita Wilbur were effectively dismissed from this action by virtue of the Court's decision on Defendants' Motion for Summary Judgment. [**Doc. #50**]. As noted in that Order, the only remaining claim to be resolved at trial is Plaintiff's Title VII retaliation claim pertaining to her time in the Purchasing Department, which by law cannot be asserted against individual Defendants Goldman and Wilbur.

1 had previously scheduled commitments related to the Presidential Caucus which has taken him out
2 of the office this week. It is important to note that a trial date has not yet been set in this case, and as
3 such, the trial will not need to be postponed due to the requested extension.

4 This is the parties' third request for an extension of this deadline and it is sought in good faith
5 and not for the purpose of delay.

6 Dated: February 19, 2016

Dated: February 19, 2016

7 Respectfully submitted,

Respectfully submitted,

9 /s/ Richard Segerblom

/s/ Ethan D. Thomas

10 RICHARD SEGERBLOM, ESQ.

BRUCE C. YOUNG, ESQ.

ETHAN D. THOMAS, ESQ.

11 Attorney for Plaintiff

LITTLER MENDELSON, P.C.

ELENA RODRIGUEZ-MALFAVON

Attorneys for Defendants

CLARK COUNTY SCHOOL DISTRICT,

EDWARD GOLDMAN and ANITA WILBUR

15 **ORDER**

16 **IT IS SO ORDERED.**

17 IT IS FURTHER ORDERED that no further extensions will be allowed.

18 Dated: February 22, 2016.

20 
21 UNITED STATES MAGISTRATE JUDGE